

SPEARS & IMES LLP

MEMORANDUM ENDORSED

September 23, 2022

BY ECF

Hon. Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
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U.S. v. Amit Bhardwaj, et al., 22 Cr. 398 (GHW)

Dear Judge Woods:

I respectfully write to request that the travel restrictions that are part of Mr. Bhardwaj's bail conditions in this case be temporarily eased to allow him to travel throughout the State of California for the remainder of September, October, and November of 2022. Currently, his travel is restricted to the Northern District of California. The purpose of this request is to allow Mr. Bhardwaj to take his son, who is a senior in high school, on visits to colleges in other districts within California in the next handful of months, beginning this upcoming Sunday to Monday.

The Pretrial Services Office in the Northern District of California, which is providing courtesy supervision of Mr. Bhardwaj in this case due to Mr. Bhardwaj's residence in California, consents to this request. The Pretrial Services Office in the Southern District of New York and the Government also consent to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Max Nicholas
Attorney for Amit Bhardwaj

Application granted. The conditions of Mr. Bhardwaj's pre-trial release are modified as follows: until December 1, 2022, Mr. Bhardwaj may travel to the Southern, Eastern and Central Districts of California. All other conditions of the defendant's pre-trial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 49.

SO ORDERED.

Dated: September 23, 2022
New York, New York



GREGORY H. WOODS
United States District Judge